



13 January 2016

Darrington Collaborative
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Dear Collaborative Members:

Thank you for requesting public comment on the projects you are planning with the US Forest Service. It is imperative that the Forest Service prepare Environmental Assessments (EAs) for these projects, in order to fully evaluate their environmental impacts.

Segelsen Timber Sale

We have many questions and concerns about this proposal.

The photos on your website certainly don't appear to represent high quality habitat for sensitive, threatened and endangered species, but is this truly representative of the entire 70 acres to be "treated"? We are concerned that there may be forest within the project area that is already "self-thinning" and naturally returning to diverse habitat, and would be harmed by human intervention. We would welcome the opportunity to visit the planned sale area with Forest Service staff.

What is the proposed thinning intensity? Most USFS thinning sales tend to be very heavy, with resultant harmful effects on soil, remaining trees, water quality, and wildlife. Will this be a "thin from below," with only trees smaller than a specified diameter removed? The larger trees, especially the "very large old-growth legacies," should be retained and protected from damage during logging. We suggest leaving trees around these larger trees to reduce the risk of subsequent windthrow.

We question the ecological benefits of thinning, especially in comparison to the harm caused by road-building and damage to remaining vegetation and soils. Slow tree growth in dense stands is a natural process, and scientific studies have not shown that increasing the growth rate of trees is a positive thing—or even if it always occurs after thinning.

What road construction or reconstruction would be required? What is the current condition of roads to be rebuilt? If they are already revegetated, road work should be considered new construction. Will bridges need to be built? Can the trees be removed by helicopter instead? The detrimental effects of forest roads are well known, and include sedimentation of streams and rivers through simple erosion as well as mass wasting, water pollution from petrochemical and other toxic runoff, littering and garbage dumping, poaching, other wildlife disturbance, and increased risk of fire—all of which adversely affect fish and wildlife populations.

What is the nature of the proposed STEM-associated monitoring studies? We would encourage the completion of thorough wildlife surveys both *before and after* logging, as well as studies of effects on vegetation, air and water temperatures, and water quality. "Citizen science" volunteers can be recruited to help if necessary. A commitment must be made to continue this monitoring long term, at least for several decades. If this can be done, it would represent a positive development, as the Forest Service has failed to adequately monitor the effects of logging on resident flora and fauna in the past, resulting in a dearth of scientifically-supported information in this area.

Clear Creek Riparian Restoration

This project as currently described merely constitutes road maintenance, which admittedly would improve water quality in Clear Creek and the Sauk River. But the project could be vastly improved and would represent true restoration if it included road decommissioning as well. We understand that Road 2060 has been proposed for decommissioning by the Forest Service beyond the Road 2065 fork. This would be an excellent candidate for road to trail conversion, providing a longer, scenic access to Lake Kelcema via Deer Creek Pass. Even if the road were maintained to the climbing access routes, decommissioning the remainder would benefit the Clear Creek system.

There is no need to maintain Road 2065 past the Squire Creek trailhead. Beyond this point it should be converted to a trail to access Copper Creek Falls. The road here already has significant tree growth, allowing for a more pleasant hiking experience than an open road walk. These road to trail conversions would increase recreational opportunities near Darrington, facilitating tourism and economic development in the area.

In summary, we believe that Darrington's economy would be better served by improving recreational opportunities than by destroying the natural beauty that tourists come to see. We appreciate your willingness to consider these comments and suggestions prior to the implementation of the NEPA process for this project. Please feel free to contact me with questions or for further discussion.

Sincerely,

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